

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

\_\_\_\_\_  
BARBARA STROUGO, Individually and  
on Behalf of All Others Similarly Situated,

Plaintiff(s),

v.

\_\_\_\_\_  
BARCLAYS PLC, BARCLAYS  
CAPITAL, INC., ROBERT DIAMOND,  
ANTONY JENKINS, CHRISTOPHER  
LUCAS, TUSHAR MORZARIA, and  
WILLIAM WHITE,

Defendants.

**Case No. 14-cv-5797 (SAS)**

**DECLARATION OF EMMA GILMORE IN SUPPORT OF PLAINTIFFS' MOTION  
FOR CLASS CERTIFICATION, APPOINTMENT OF CLASS REPRESENTATIVES  
AND APPOINTMENT OF CLASS COUNSEL**

Emma Gilmore declares under penalty of perjury:

1. I am an attorney associated with Pomerantz LLP, proposed Class counsel for Lead Plaintiff Lead Plaintiff Mohit Sahni and Plaintiff Joseph Waggoner (collectively, "Plaintiffs").

I submit this Declaration in support of Plaintiffs' Motion for Class Certification, appointment of Class Representatives and appointment of their selection of the law firm of Pomerantz LLP as Class counsel.

2. Attached hereto as Exhibit A is a true and accurate copy of the Expert Report of Zachary Nye, PH.D., dated July 24, 2015.

Dated: July 24, 2015

/s/ Emma Gilmore

EMMA GILMORE